

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

IN RE:	§	
	§	
DEEPROOT CAPITAL MANAGEMENT,	§	
LLC, ET AL.,	§	BANKRUPTCY No. 21-51523
	§	
DEBTORS.	§	JOINTLY ADMINISTERED

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**TRUSTEE’S AMENDED WITNESS AND EXHIBIT LIST FOR NOVEMBER 22, 2022 HEARINGS ON:**

**TRUSTEE’S MOTION TO APPROVE SALE OF PINBALL PROPERTY  
AND  
TRUSTEE’S RULE 9019 MOTION TO APPROVE  
COMPROMISE AND SETTLEMENT WITH DRAPER 5, LLC  
[RELATING TO ECF NOS. 181 AND 182]**

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John Patrick Lowe, Chapter 7 Trustee (“**Trustee**”), files this Amended Witness and Exhibit List for the November 22, 2022 Hearings scheduled relating to the matters listed below.

**MATTERS TO BE HEARD:**

1. *Trustee’s Motion to Approve Sale of Pinball Property* [ECF No. 181] (the “**Sale Motion**”); and
2. *First Interim Application for Allowance of Fees and Expenses for to Greg T. Murray, P.L.L.C., as Accountant to Trustee for the Time Period of January 3, 2022 to September 30, 2022* [ECF No. 190] (the “**Murray Fee Application**”)

**TRUSTEE’S WITNESSES:**

Trustee designates the following witnesses:

1. J. Patrick “Pat” Lowe, Chapter 7 Trustee of the jointly administered bankruptcy estates
2. Chris Turner, Turner Logic
3. Greg T. Murray, CPA
4. Any witness called or designated by any other party;
5. Any rebuttal or impeachment witnesses, as necessary; and
6. Any person present at the Hearing (live or via WebEx)

Trustee reserves the right to amend or supplement this list at any time prior to the hearing.

**TRUSTEE'S AMENDED EXHIBITS**

Ex. #	Description	Offered	Objection	Admitted/ Not Admitted	Disposition
1	Property Description [EXH A to ECF No. 181]				
2	Purchase and Sale Agreement by and between Trustee and Turner Logic, LLC (EXH B to ECF No. 181)				
3	Approved Notice of Sale with Sale Procedures (EXH F to ECF No. 181)				
4	Certificate of Service of Notice of Sale with Sale Procedures [ECF No. 203]				
5	Greg Murray Invoice for Services Rendered [EXH C to ECF No. 190]				
*6	Becky Harker Invoice for Services Rendered to Greg Murray (bookkeeping services)*				
*7	Supplemental Certificate of Service – Notice/Summary of Second Fee App of Trustee Counsel and Notice/Summary of First Fee App of Trustee Forensic Accountant [ECF No. 202]*				
	Any exhibits designated by any other party				
	Any rebuttal or impeachment exhibits				

\*These exhibits have been added to the original list filed at ECF 204.

Trustee reserve the right to amend or supplement this list at any time prior to the hearing.

Respectfully submitted,

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**ATTORNEYS FOR CHAPTER 7 TRUSTEE**

**CERTIFICATE OF SERVICE**

I hereby certify that on the 21<sup>ST</sup> day of November, 2022, I electronically filed the foregoing document using the CM/ECF system, which will serve the document to the following parties requesting notice (a copy of the exhibits will be served via email).

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deeproot Growth Runs Deep Fund, LLC

deeproot 575 Fund, LLC

deeproot 3 Year Bonus Income Fund, LLC

deeproot BonusGrowth 5 Year Debenture Fund, LLC

deeproot Tech, LLC

deeproot Funds, LLC

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Texas Workforce Commission

c/o Christopher S. Murphy

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